

1 ROD DANIELSON, Chapter 13 Trustee
2 Bridget Kelly, 256197
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9 UNITED STATES BANKRUPTCY COURT
10 CENTRAL DISTRICT OF CALIFORNIA
11 RIVERSIDE DIVISION

12)	Case No.: 6:23-bk-14082-WJ
13	IN RE:)	
14)	Chapter 13
15)	
16	PATRICIA ANN DOUBLET,)	CHAPTER 13 TRUSTEE'S REPLY TO
17)	DECLARATIONS IN SUPPORT OF
18)	CONFIRMATION
19)	
20	Debtors.)	<u>Confirmation Hearing</u>
21)	Date: June 10, 2024
22)	Time: 11:00 AM
23)	Courtroom: 304
24)	
25)	

19 Pursuant to the Court's scheduling order entered, the Chapter 13 Trustee is required to
20 file either a pleading stating support of confirmation or a motion requesting dismissal. The
21 debtor is current with the plan payments, however, the trustee is unable to support
22 confirmation at this time because it appears the Declarations in Support of Confirmation
23 ("Declarations") filed on May 15, 2024 failed to address the issues discussed at the last
24 confirmation hearing on February 7, 2024.
25

1 Per the scheduling order filed on February 7, 2024, the debtor was ordered to file a
2 brief addressing the issues discussed at the hearing that day, including whether the chapter 13
3 plan is feasible. Per the staff attorney's notes from that hearing, the feasibility issue had to do
4 with the high arrears amount and the prior failed cases. But the Declarations only discuss the
5 prior cases. There is no mention of the high arrears or the circumstances surrounding the high
6 arrears.

7
8 For all the foregoing reasons, the Chapter 13 Trustee cannot recommend confirmation
9 at this time and objects to confirmation of the plan as it appears the debtor is not in compliance
10 with the Court's order.

11 Dated: May 22, 2024

12 /s/Rod Danielson
13 ROD DANIELSON, Chapter 13 Standing Trustee
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DECLARATION OF BRIDGET KELLY

I, BRIDGET KELLY, declare as follows:

1. I am an attorney licensed by the State of California to practice law. I am a Staff Attorney for Rod Danielson, Chapter 13 Standing Trustee for the Riverside Division of the United States Bankruptcy Court for the Central District of California. I am admitted to practice before the District Court for the Central District of California.

2. I have personally reviewed the files, records, and documents in this case and I am familiar with the facts contained in those documents. If called as a witness, I could and would be able to testify as to the facts contained therein.

3. Per the scheduling order filed on February 7, 2024, the debtor was ordered to file a brief addressing the issues discussed at the hearing that day, including whether the chapter 13 plan is feasible.

4. Per my notes from that hearing, the feasibility issue had to do with the high arrears amount and the prior failed cases.

5. The Declarations only discuss the prior cases.

6. There is no mention of the high arrears or the circumstances surrounding the high arrears.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed by me at Riverside, California.

DATED: May 22, 2024



Bridget Kelly

In re: **PATRICIA ANN DOUBLET**

Chapter: 13

Debtor(s)

Case Number: **6:23-bk-14082-WJ**

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 3787 University Avenue, Riverside, CA 92501.

A true and correct copy of the foregoing document entitled: **CHAPTER 13 TRUSTEE'S REPLY TO DECLARATIONS IN SUPPORT OF CONFIRMATION** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner indicated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF") - Pursuant to controlling General Orders LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On

_____, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☐ Service Information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On 5/22/2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing

<u>Debtor</u>	<u>Attorney for Debtor</u>
PATRICIA ANN DOUBLET	NEXUS BANKRUPTCY
4890 HUNTSMEN PL	3090 BRISTOL ST #400
FONTANA, CA 92336-0401	COSTA MESA, CA 92626

☐ Service Information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P.5 and/or controlling LBR, on 05/22/2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here

HONORABLE WAYNE E.
JOHNSON
3420 TWELFTH STREET
COURTROOM 304
RIVERSIDE, CA 92501-3819

☐ Service Information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

5/22/2024

Date

/s/ Susan Jones

Signature